

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

JENNIFER VANDERSTOK, *et al.*,

*Plaintiffs,*

v.

MERRICK GARLAND, in his official  
capacity as Attorney General of the United States;  
*et al.*,

*Defendants.*

Civil Action No. 4:22-cv-00691-O

**DECLARATION OF MICHAEL G. ANDREN**

I, Michael G. Andren, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge:

1. I am over 18 years of age and am competent to testify to the matters contained herein.
2. I reside in Springtown, Texas within Parker County.
3. I am not prohibited from possessing firearms under federal or state law. I have purchased at least one firearm through a Federal Firearms Licensee (FFL), undergoing and passing the required federal background check.
4. I am a retired aerospace administrator. I previously worked for Northrop Grumman in a Research and Development testing organization on several Top Secret/Sensitive Compartmented Information projects, including on the B-2 Spirit Stealth Bomber, Advanced Tactical Fighter competitions, as well as other highly classified programs. Many of those programs remain classified to this day.

5. I am a licensed firearms instructor, teaching classes on firearms safety. I currently hold certifications for pistol, rifle, and shotgun instruction and I am a frequent volunteer at various public events that involve firearms. These events promote the safe use of firearms to the general public. I also hold a Texas License to Carry permit as well as non-resident carry permits for the states of Arizona, Florida, and Utah.

6. I currently possess at least two firearms that I have personally manufactured using the products at issue in this case, marketed as “80% lowers.” I use these firearms for lawful purposes, including but not limited to self-defense and as a test bed for minor refinements. As an amateur gunsmith, I appreciate the process of crafting a personal use firearm using my own ability and expertise.

7. I wish to continue to purchase such products in the future and self-manufacture additional personal use firearms to own and use for lawful purposes, such as self-defense and minor refinement testing. I would do this but for Defendants’ rule that seeks to prohibit me from purchasing these products directly from the company, without involvement of an FFL.

8. I wish to continue to self-manufacture personal use firearms for several reasons, including but not limited to continuing to employ my gunsmithing ability and continuing to learn about the function and construction of firearms. This knowledge will help ensure I continue to safely operate firearms, which I have done my entire life. I also believe that I have the individual right to build my own self-defense tools and to purchase the materials necessary to do so.

9. The Final Rule at issue in this case will prohibit me from engaging in an activity that I have already engaged in and wish to, have the right to, and have concrete plans to continue to engage in and thus will detrimentally impact me. The Final Rule at issue also fundamentally alters the legal landscape that I have relied on to conduct and plan my personal practices.

DATED this the 16th day of August, 2022.

A handwritten signature in blue ink, reading "Michael G. Andren". The signature is written in a cursive style with a horizontal line underneath the name.

Michael G. Andren